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Hearing Date and Time:
January 31, 2020 at 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-X

In re:

Chapter 11

34 Holding Corp.,

Case No. 18-23408 (RDD)

Debtor.

-X

LIMITED OBJECTION TO PLAN ADMINISTRATOR'S STATEMENT [ECF NO. 99]

**TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:**

34 Holding Corp., (the "Debtor"), by and through its counsel, hereby respectfully submits its objection (the "Objection") to the Statement in Support of Award of Legal Fees, Costs and Sanctions on Motions for Contempt (the "Statement") filed by 34 W. 128 Funding, Inc. (the "Plan Administrator") dated January 17, 2020 for the following reasons:

1. The Statement refers to the "purported agreement" between the "Trendi Homes Parties" and "Klein" for the use and occupancy of the Debtor's property calculated at \$8,000 per month for eight months or \$64,000.
2. To the extent that there is an implication that the Debtor or Debtor's principal are responsible for this sum as well as the sums for legal fees, costs and sanctions on the motions for contempt in which neither the Debtor nor its principal was named, the Debtor objects.
3. As stated in the Statement, the PA has commenced an adversary proceeding against the Debtor's principal, Mr. Klein. Therefore, the Debtor and its principal object to

any inference of acquiescence or responsibility with regard to the Trendi Homes
Parties' contempt

WHEREFORE, the Debtor requests that there be clarification that no inference is to flow
to the Debtor or its principal and granting such further and other relief as the Court deems just
and proper.

Dated: Norfolk, CT
January 24, 2020

/s/Amanda Medina
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